

No. 3:15-cr-00037-2
IN THE UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

BENJAMIN BRADLEY,

Defendant.

SUPPLEMENT TO MOTION TO MODIFY SENTENCE

Defendant Benjamin Bradley, through undersigned counsel, hereby submits this Supplement to provide the Court new information in support of his motion to modify his sentence.

When the government filed its response to Mr. Bradley's motion on June 4, 2020, the BOP reported five inmates who had active cases of COVID-19 at FCI Milan. (Dkt. 1262, Gov't Response, PageID# 5824.) One week later, the reported number of active cases at Milan has doubled to 10 inmates, and at least 2 staff members also have active cases. *BOP: COVID-19 Update*, Fed. Bureau of Prisons, <https://www.bop.gov/coronavirus> (last accessed June 11, 2020).

Exhibit A is a message from Mr. Bradley to undersigned counsel from June 9, 2020, through CorrLinks. His message confirms the new active cases at Milan. It also reports current conditions at Milan: he is being kept in a small area "with 60 other inmates," he has no soap and cannot go to the commissary to get more, and staff are not testing inmates after releasing them from quarantine.

This new information demonstrates Mr. Bradley remains susceptible to the outbreak of the disease at FCI Milan, especially in light of conditions both within the prison (*see* Dkt. 1265, Mtn. to Reconsider & Tendered Reply, PageID# 5844–45) and decreased social distancing measures in the surrounding community (*see* Dkt. 1256, Mtn. to Modify Sentence, PageID# 5526–28). Mr. Bradley’s message further demonstrates that Milan is not taking effective measures to prevent the disease’s spread.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that this Supplement was filed on June 12, 2020, using the Court’s ECF system, which will send notice of this filing to all counsel of record indicated on the electronic receipt.

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